

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

No. 12-20683

Honorable Robert H. Cleland

vs

DAVID CROSSMAN

Defendant.

STIPULATION TO ADJOURN MOTION AND PLEA CUT-OFF DATE

The above parties, by and through their respective counsel stipulate to adjourning the Motion Cut-off date to May 30, 2013, the Plea Cut-off date from June 4, 2013 to June 12, 2013 at 2:00 p.m., the Trial date is set for June 17, 2013. Counsel for both parties are engaged in meaningful plea negotiations and need additional time. Further, counsel needs additional time to consult with client and consider possible motions.

s/ Kevin Mulcahy with consent

KELVIN MULCANY
Assistant U.S. Attorney
211 W. Fort St., Ste. 2001
Detroit, MI 48226
(313) 226-9713

Dated: May 14, 2013

s/Raymond R. Burkett

RAYMOND R. BURKETT
Attorney for Mr. Crossman
37637 Five Mile Road, #177
Livonia, MI 48154
(313) 961-0192

Dated: May 14, 2013

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

No. 12-20683

Honorable Robert H. Cleland

vs

DAVID CROSSMAN

Defendant.

ORDER ADJOURNING MOTION CUT-OFF DATE

The Court, having reviewed the above stipulation of the parties and the record in this matter, and after thoroughly considering the interest of both the defendant and the public, concludes that the ends of justice require granting a continuance in this case. The Court finds that:

- (1) the failure to grant such a continuance in the proceeding would be likely to make a continuation of such proceeding impossible or result in a miscarriage of justice;
- (2) the failure to grant such a continuance in this case, although not an unusual or complex case, the defendant would be prejudiced since counsel's paralegal has only been allowed to see defendant one time.
- (3) the defendant and the government are engaged in meaningful plea negotiations.

Accordingly, the Court hereby ORDERS that the Motion Cut-off date is **May 30, 2013**,

the Plea Cut-off date is **June 04, 2013 at 2:00 p.m.**; and the Trial is set for **June 17, 2013**
at **9:00 a.m.**

SO ORDERED:

s/Robert H. Cleland
ROBERT H. CLELAND
UNITED STATES DISTRICT JUDGE

Dated: May 16, 2013